

EXHIBIT 12

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF DELAWARE

3 C.A. No. 20-613(LPS)

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6 IN RE MATTER OF:

7 THOMSON REUTERS ENTERPRISE

8 CENTRE GMBH and WEST PUBLISHING

9 CORPORATION,

10 Plaintiffs and Counterdefendants

11 -vs-

12 ROSS INTELLIGENCE INC.,

13 Defendant and Counterclaimant.

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18 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

19 REMOTE TESTIMONY OF ALAN COX

20 NOVEMBER 2, 2022 - 8:30 A.M. PDT

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24 JOB NO. 2022-866214

NOVEMBER 2, 2022

9:30 A.M. PDT

REMOTE DEPOSITION of ALAN COX, before S.
Arielle Santos, Certified Court Reporter,
Certified LiveNote Reporter and Notary Public.

REMOTE APPEARANCES:

For Plaintiffs and Counterdefendants:

KIRKLAND & ELLIS LLP

BY - MIRANDA MEANS, ESQ.

BY - ERIC LOVERRO, ESQ.

601 Lexington Avenue

New York, NY 10022

For Defendant and Counterclaimant:

CROWELL & MORING LLP

BY - WARRINGTON PARKER, ESQ.

BY- JACOB CANTER, ESQ.

3 Embarcadero Center, 26th Floor

San Francisco, California 94111

ALSO PRESENT:

FALLON SHERIDAN, JD, Kirkland & Ellis

DRAYTON EVERSON, Video Monitor.

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1 THE VIDEOGRAPHER: We are now on
2 the record on November 2, 2022, at
3 approximately 8:50 a.m. Pacific Time
4 for the remote video deposition of Alan
5 Cox in the matter of Thomson Reuters
6 Enterprise Centre GmbH, et al., versus
7 ROSS Intelligence, Inc.

8 My name is Drayton Everson, and
9 I am the videographer on behalf of
10 Lexitas.

11 Will counsel please introduce
12 themselves for the record and whom they
13 represent, beginning with the party
14 noticing this proceeding.

15 MS. MEANS: Miranda Means, I
16 represent Thomson Reuters Enterprise
17 Centre GmbH and West Publishing
18 Corporation, the plaintiffs. And I am
19 joined by my co-counsel, Fallon
20 Sheridan and Eric Loverro.

21 MR. PARKER: My name is
22 Warrington Parker, I represent ROSS
23 Intelligence. I am joined by Jacob
24 Canter.

1 THE VIDEOGRAPHER: Okay. Thank
2 you.

3 Will the court reporter please
4 swear in the witness.

5
6 ALAN J. COX, Testifies under penalty of
7 perjury as follows:

8 THE WITNESS: I do.

9
10 EXAMINATION

11 BY MS. MEANS:

12 Q Good morning, Dr. Cox.

13 A Good morning, Ms. Means.

14 Q Are you presently employed?

15 A I am self-employed.

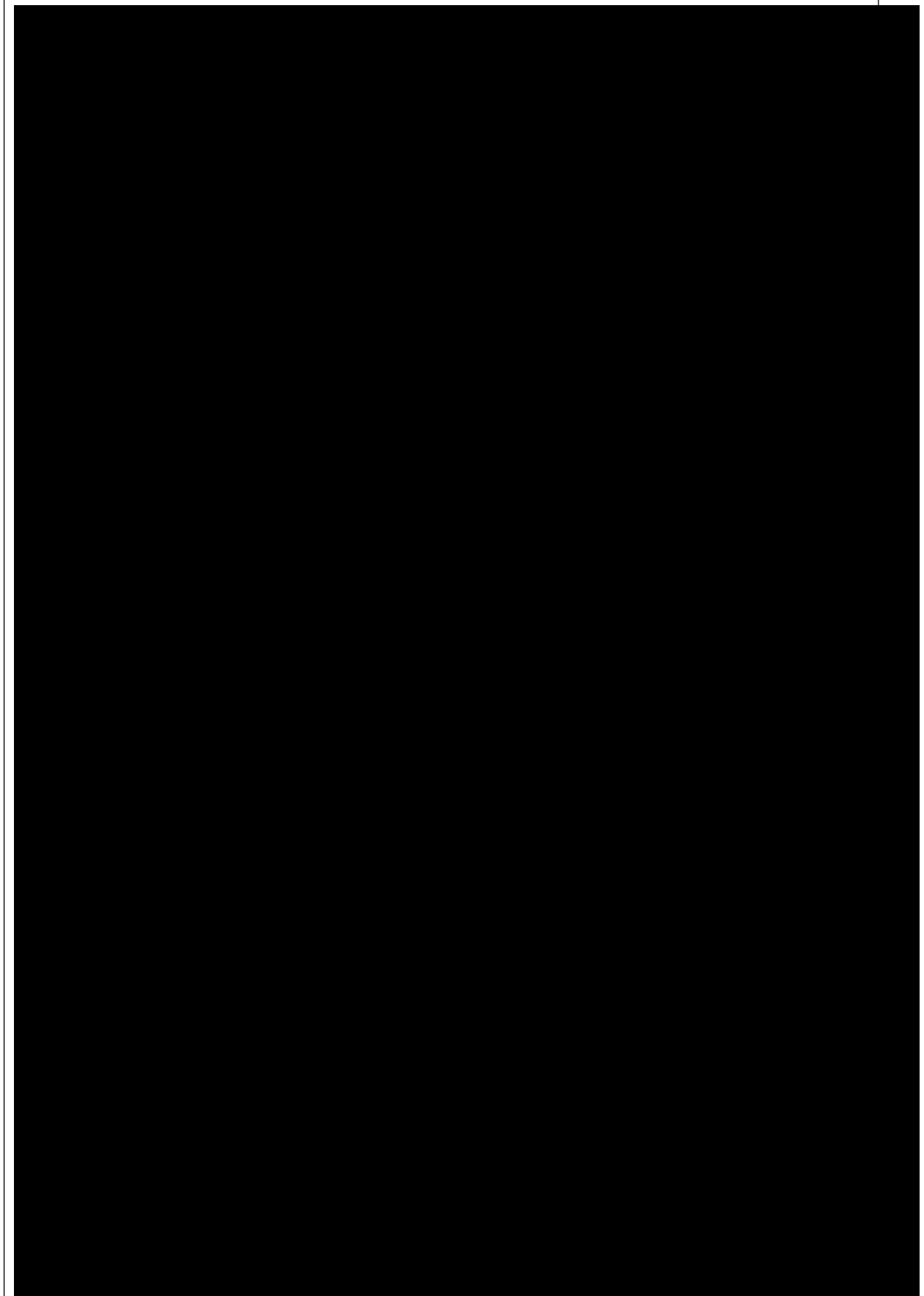
16 Q What is your title?

17 A Well, I call myself an
18 independent consultant, but I am
19 affiliated with National Economic Research
20 Associates.

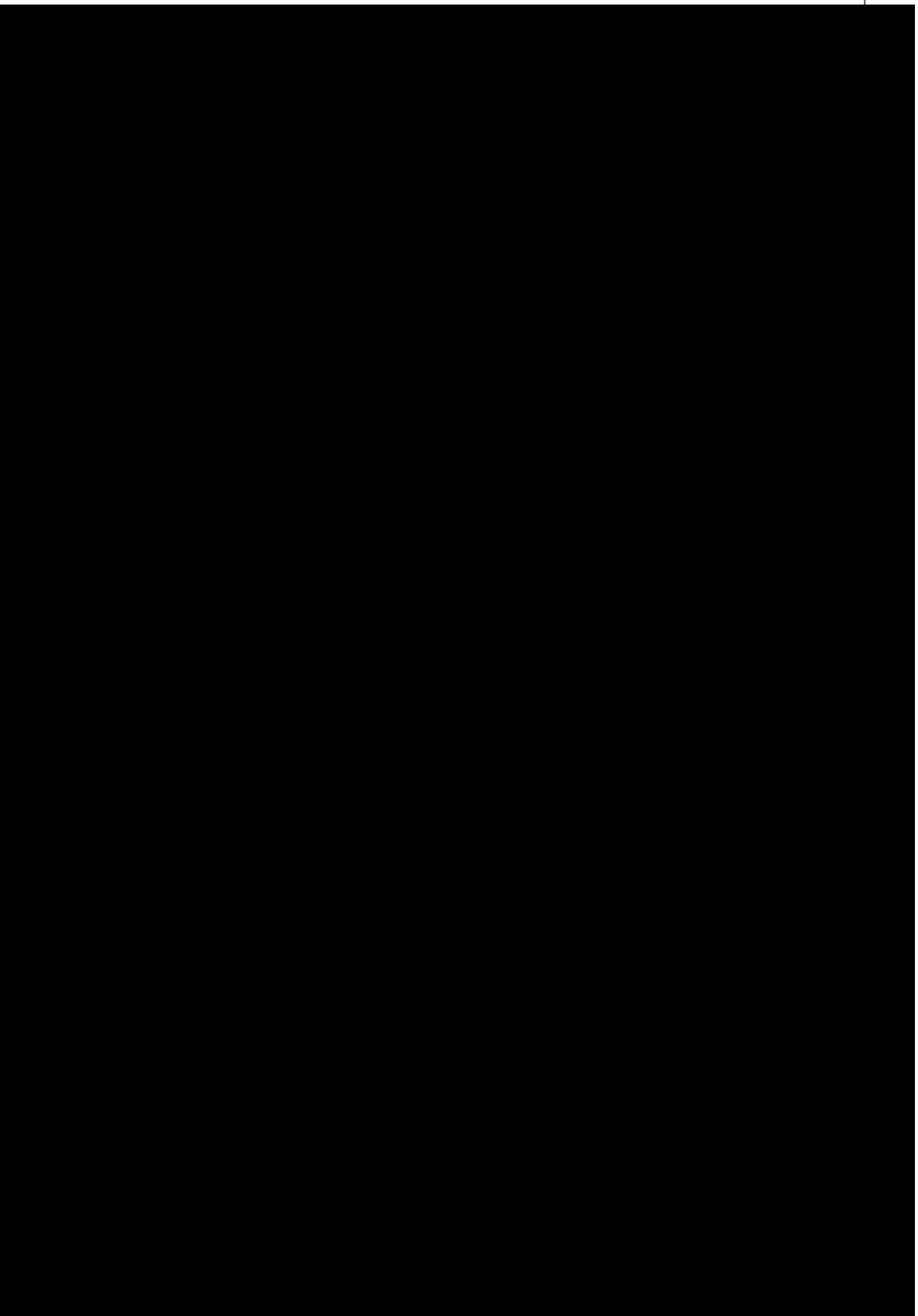
21 Q And when were you first contacted
22 about this matter?

23 A Sometime late last year, I am not
24 exactly sure when.

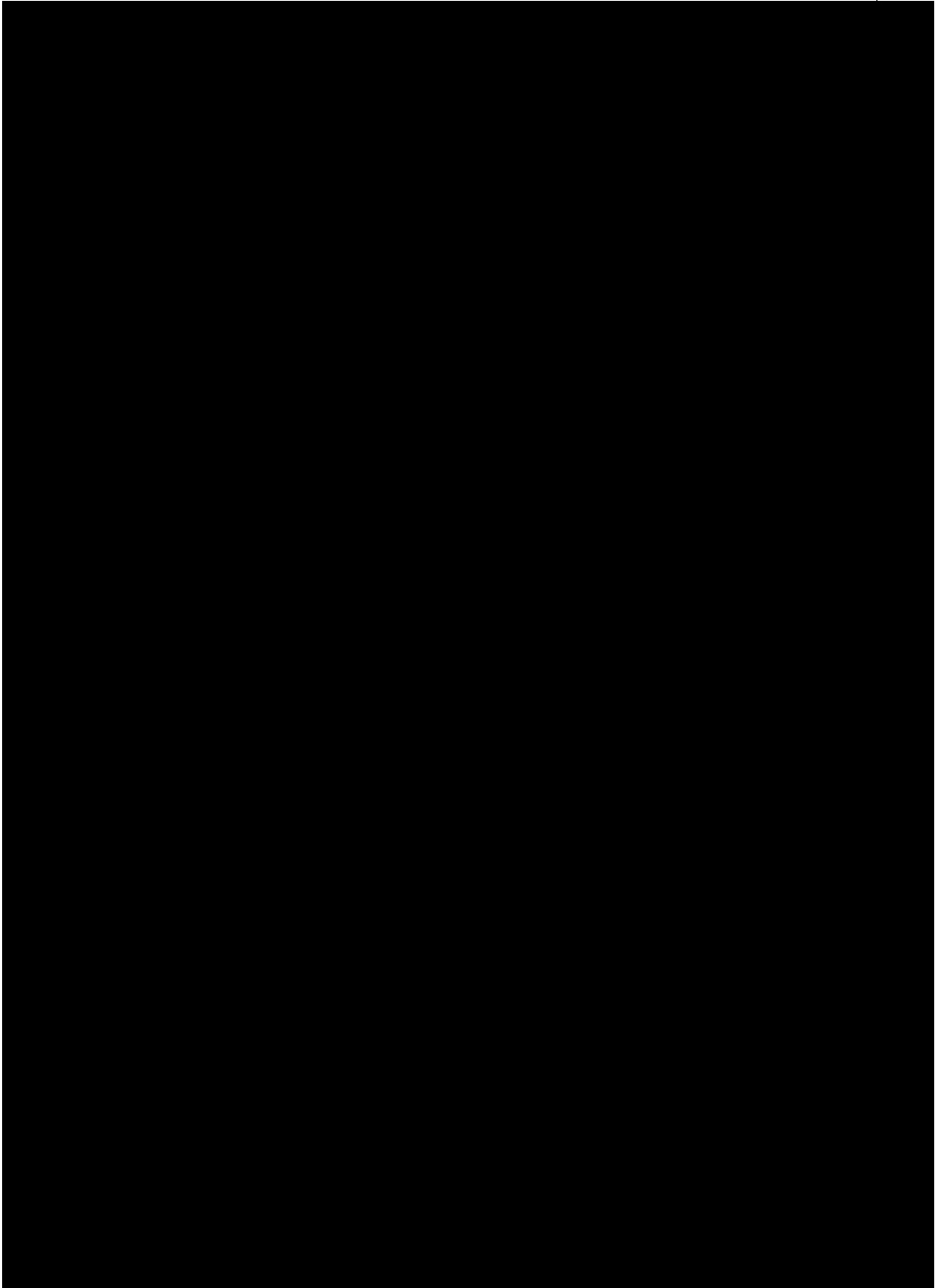
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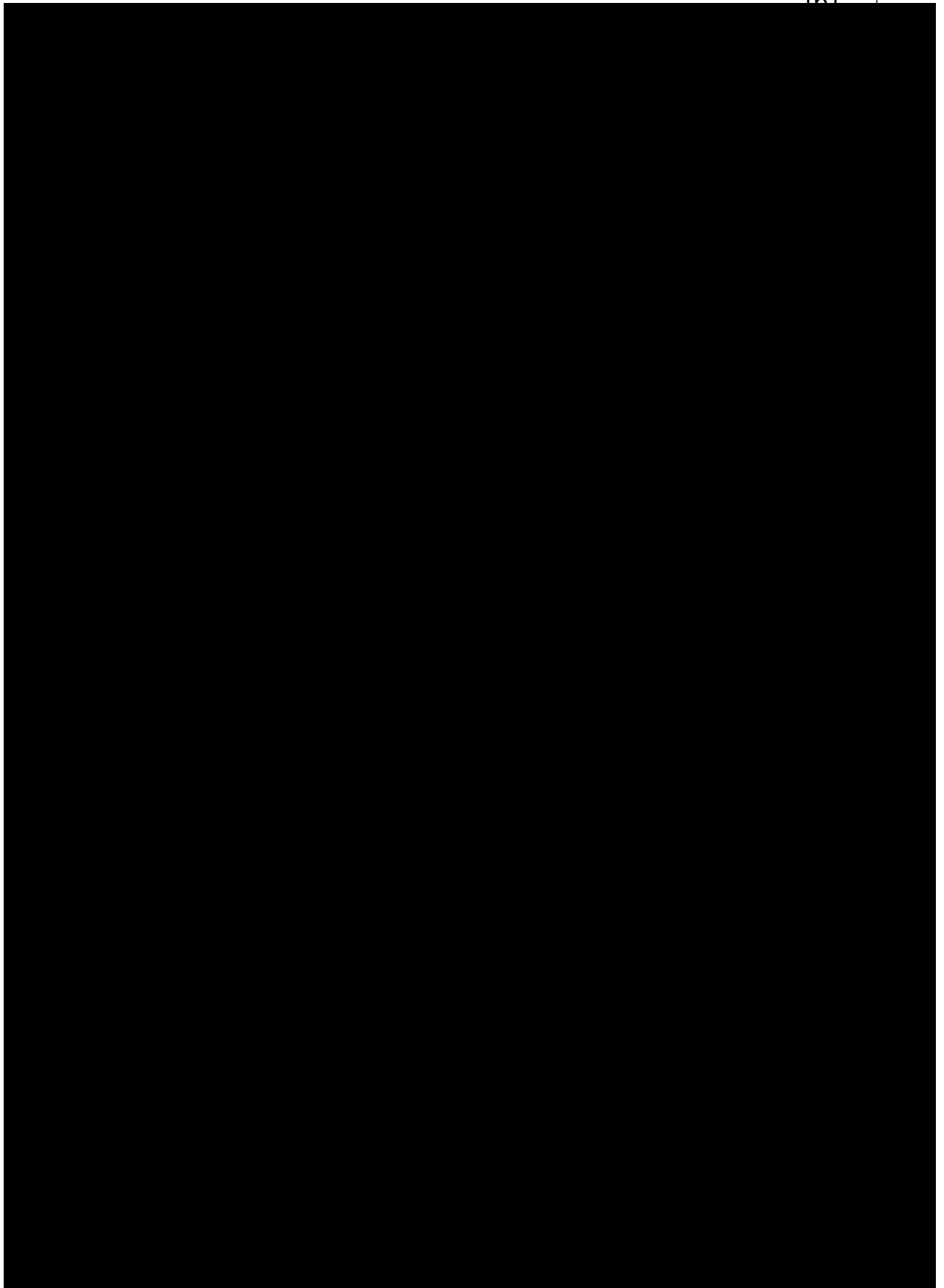
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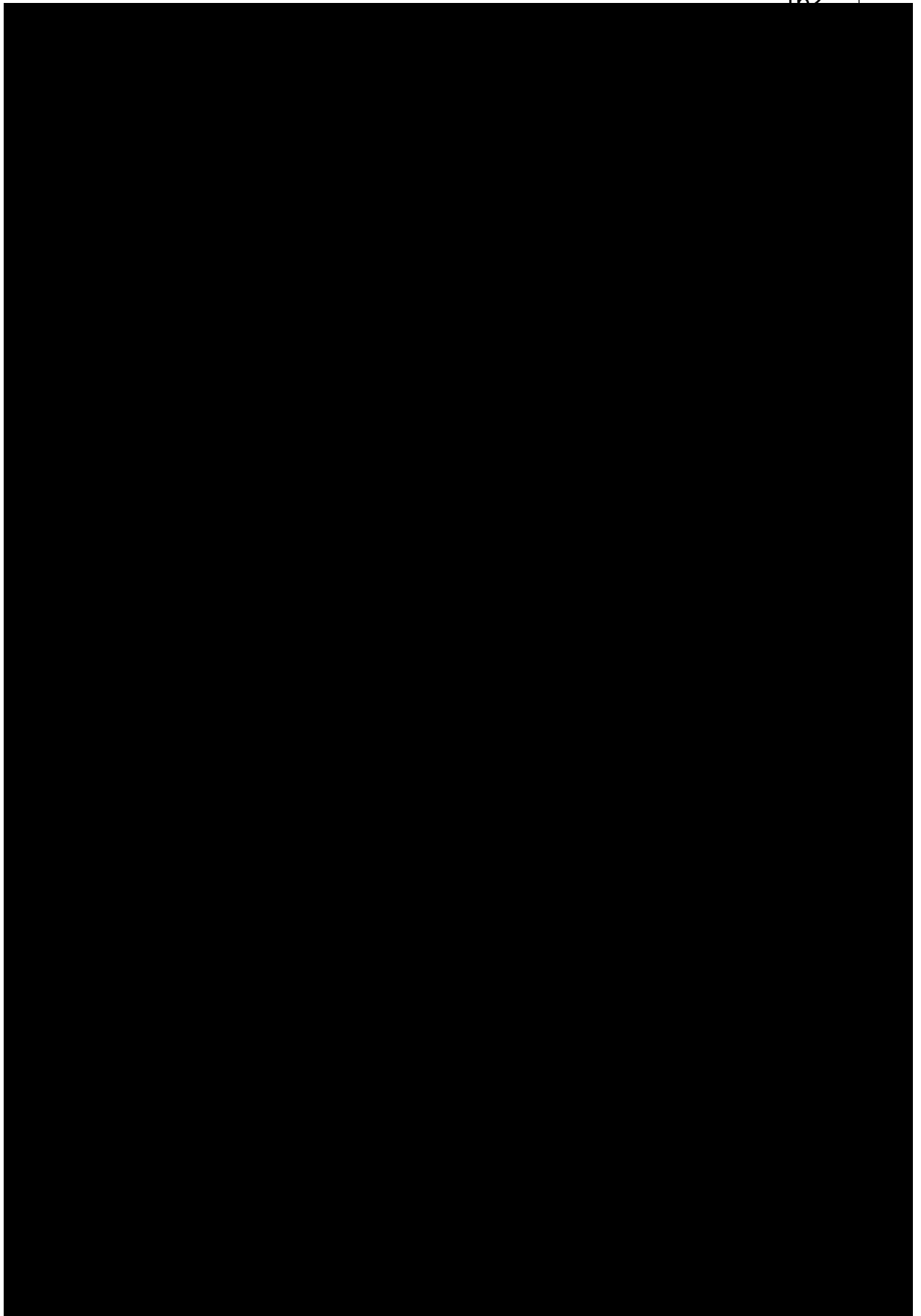
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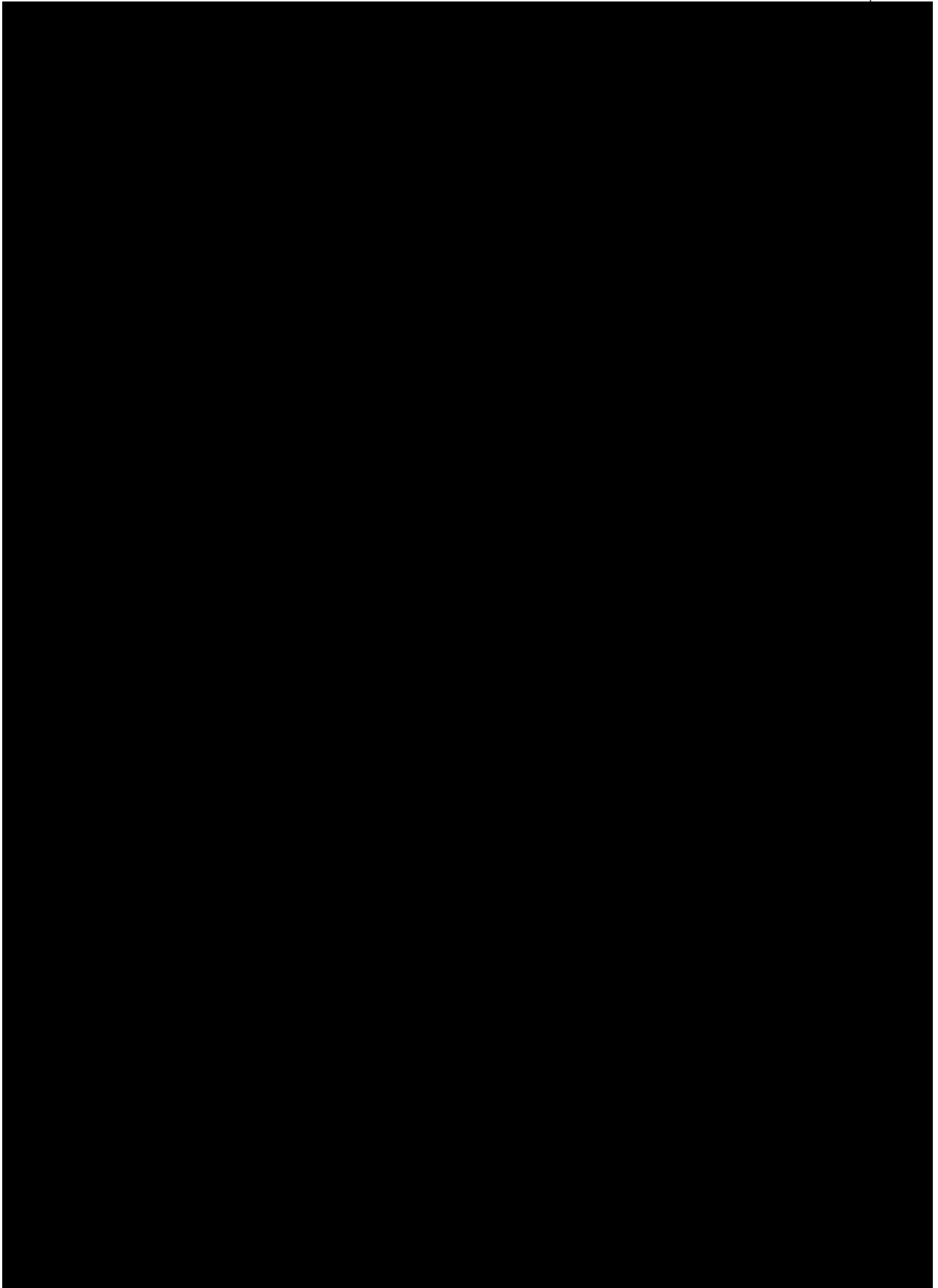
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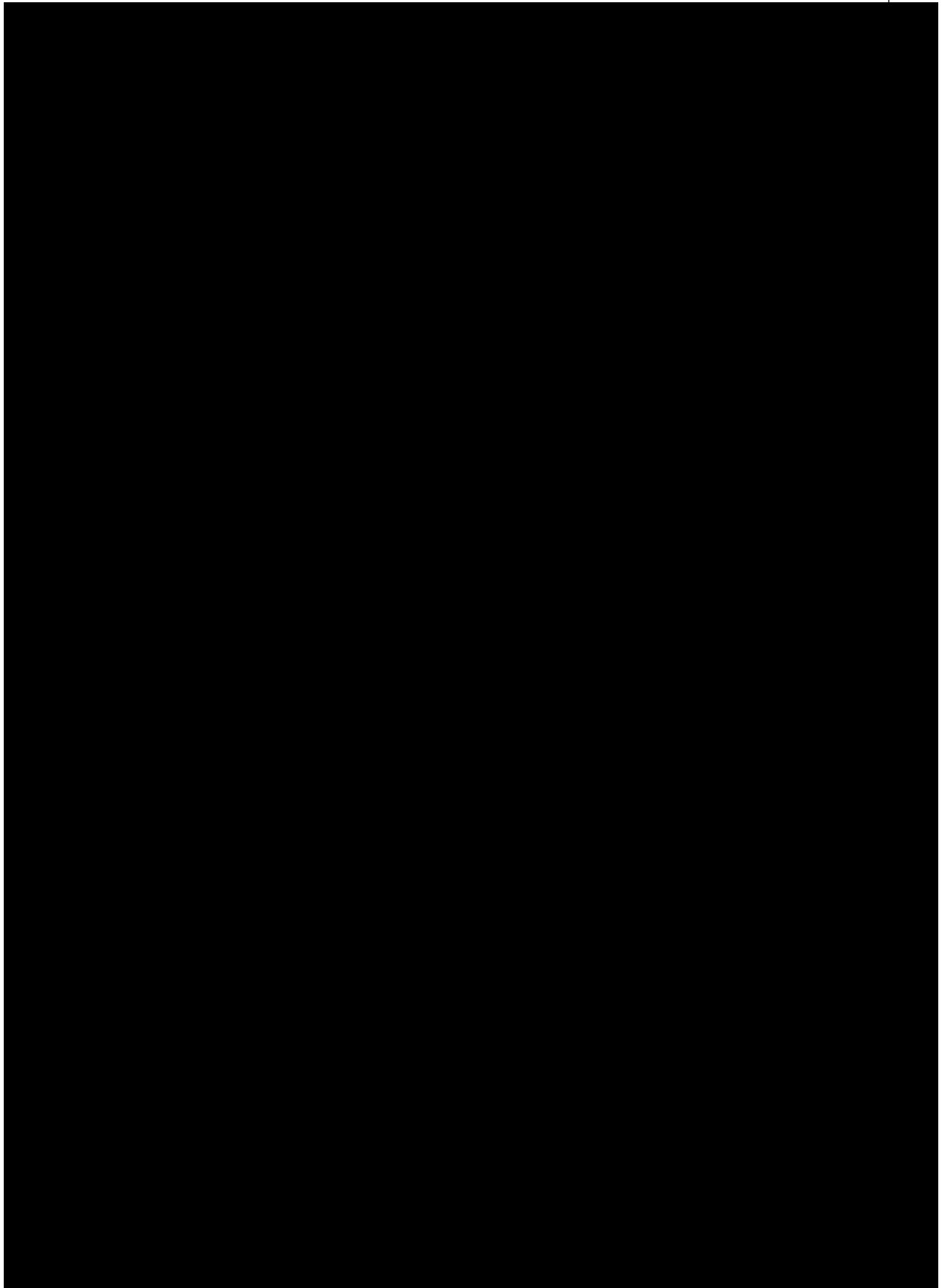
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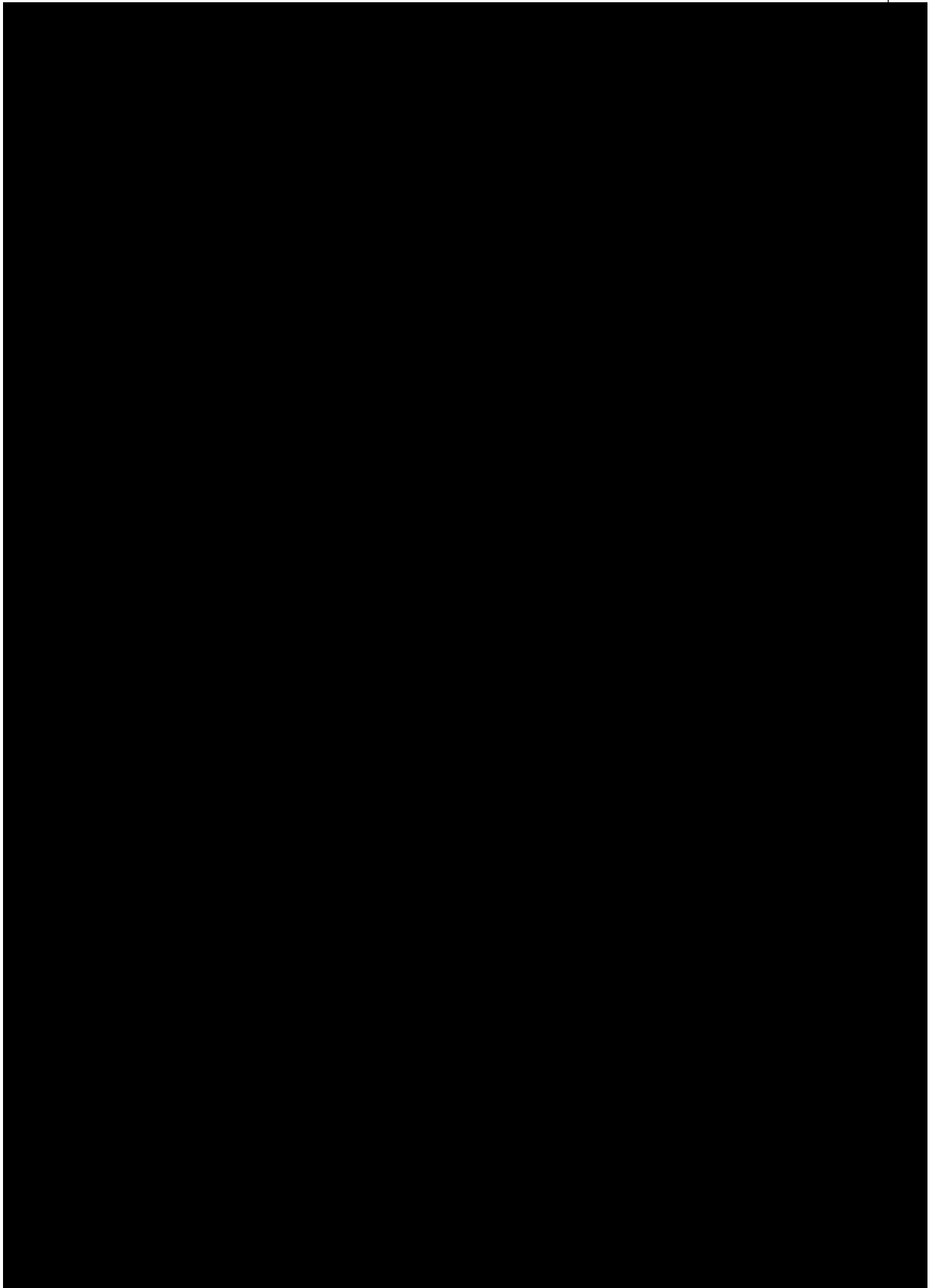
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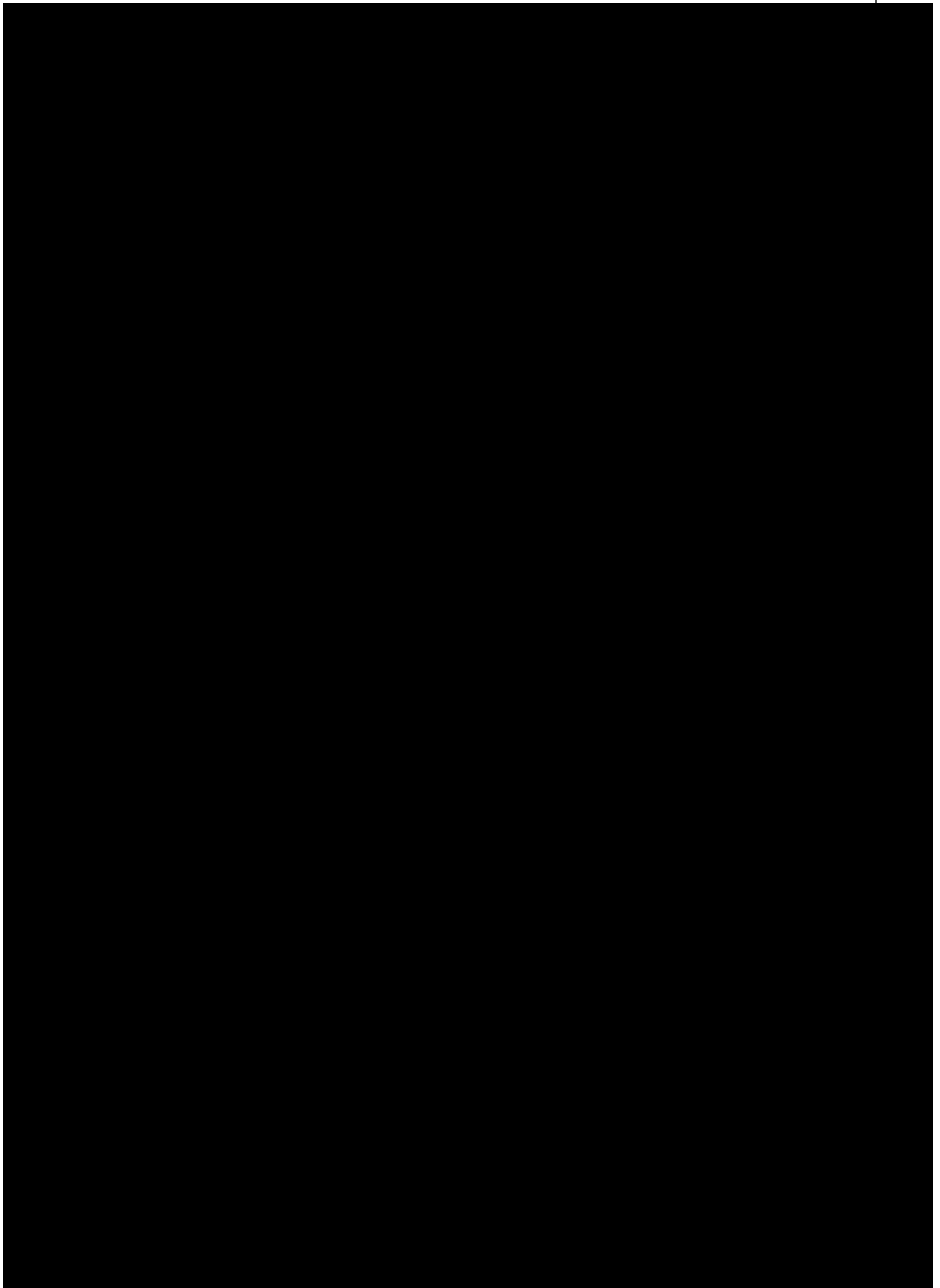
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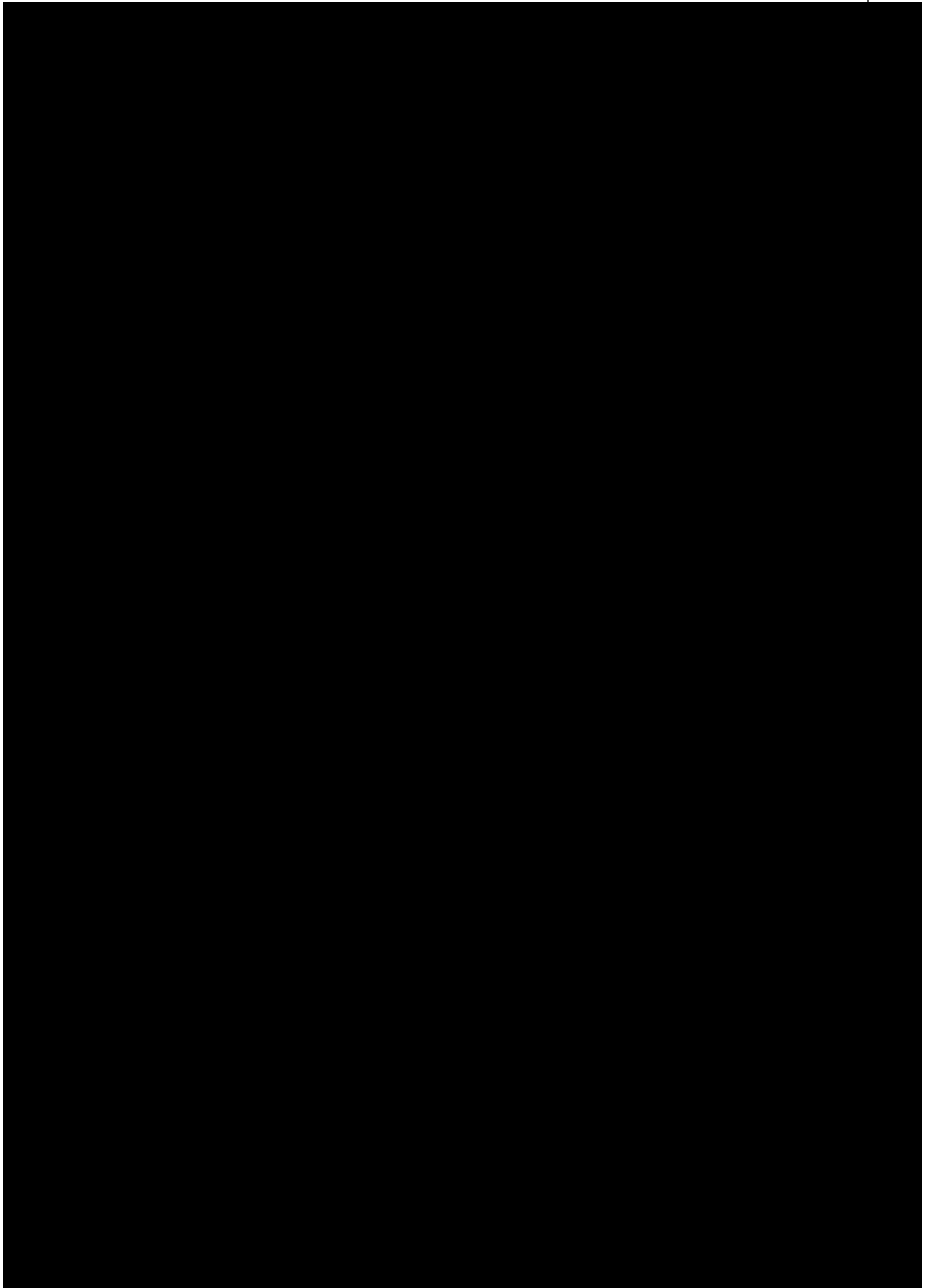
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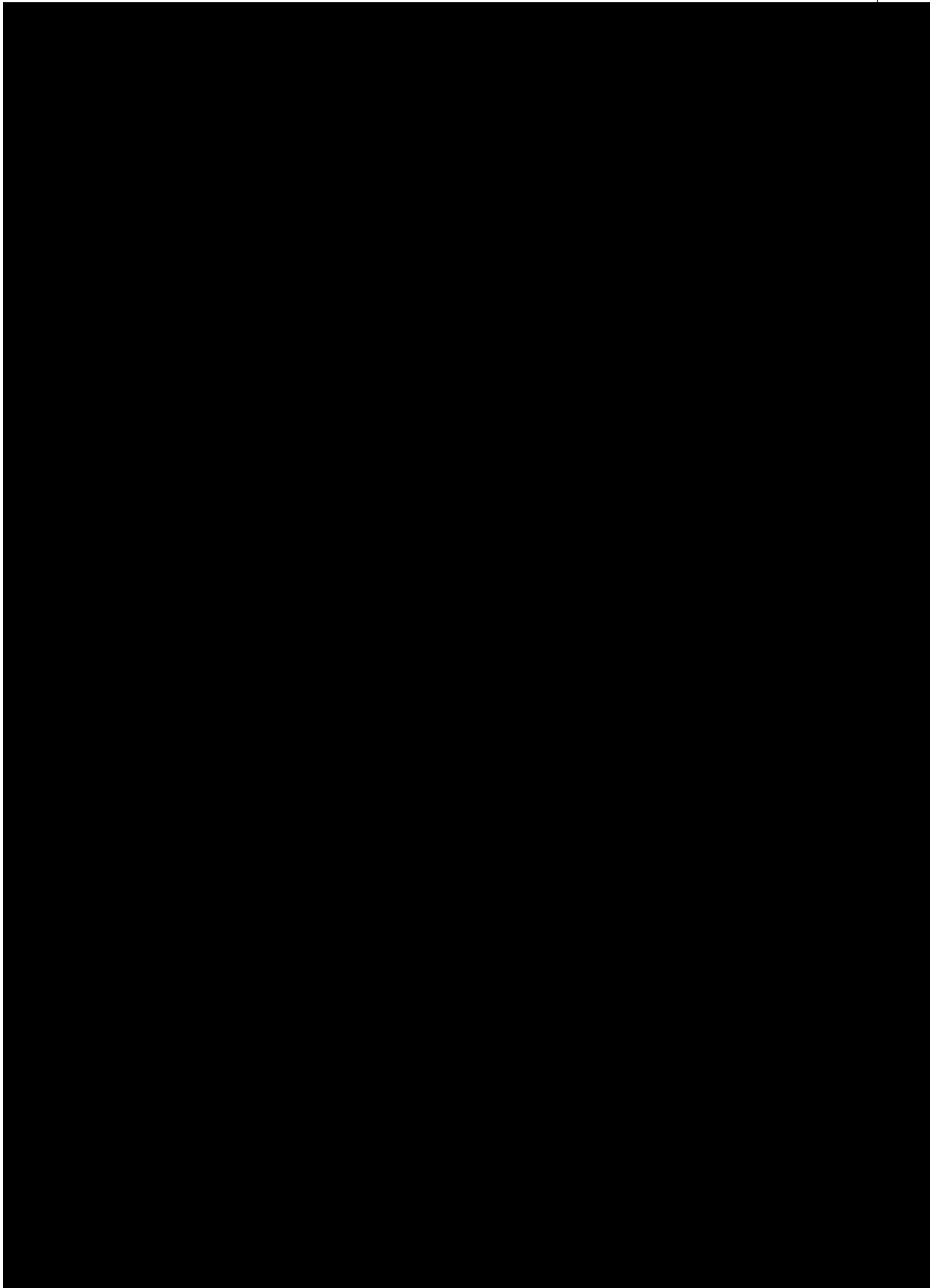


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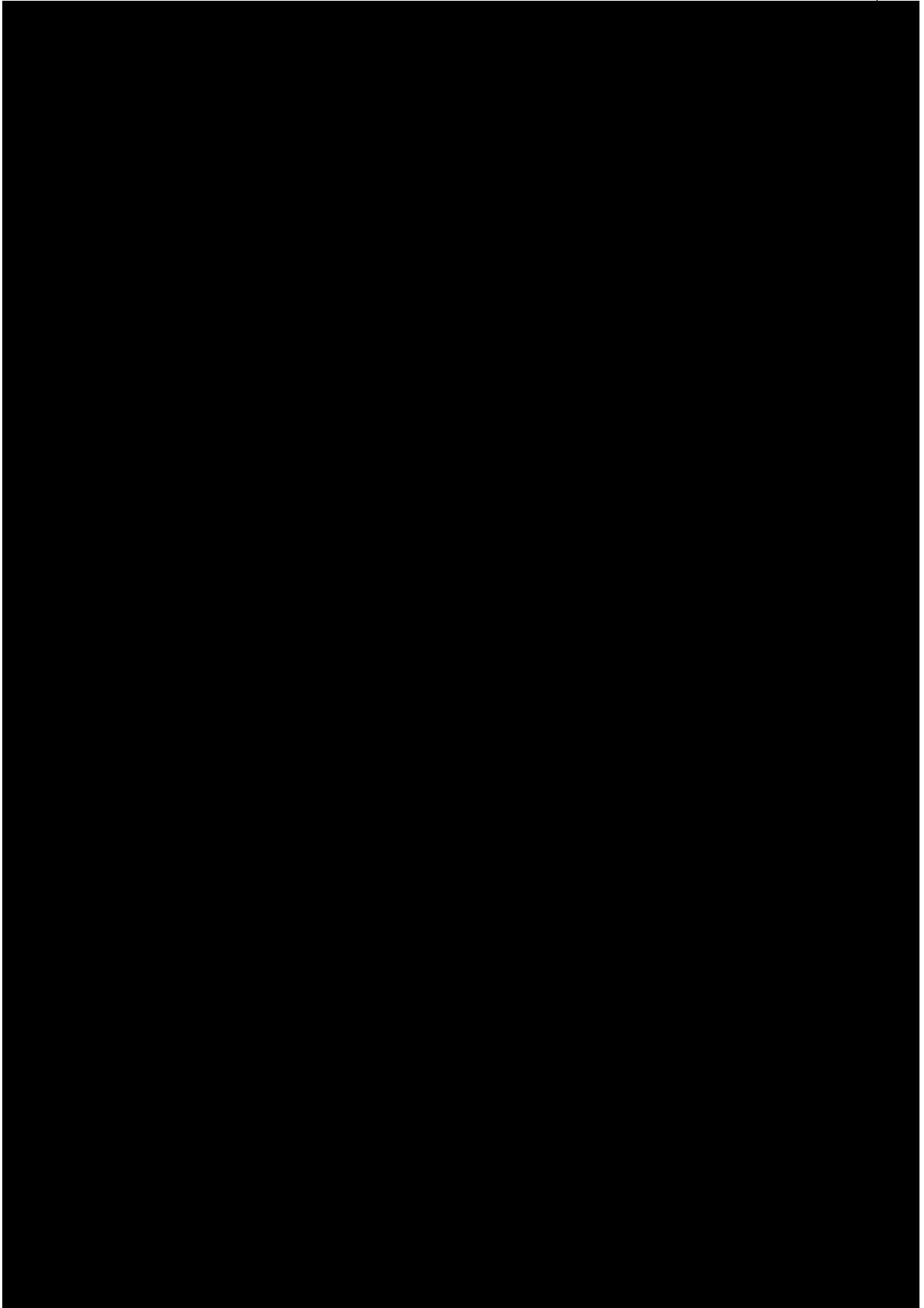
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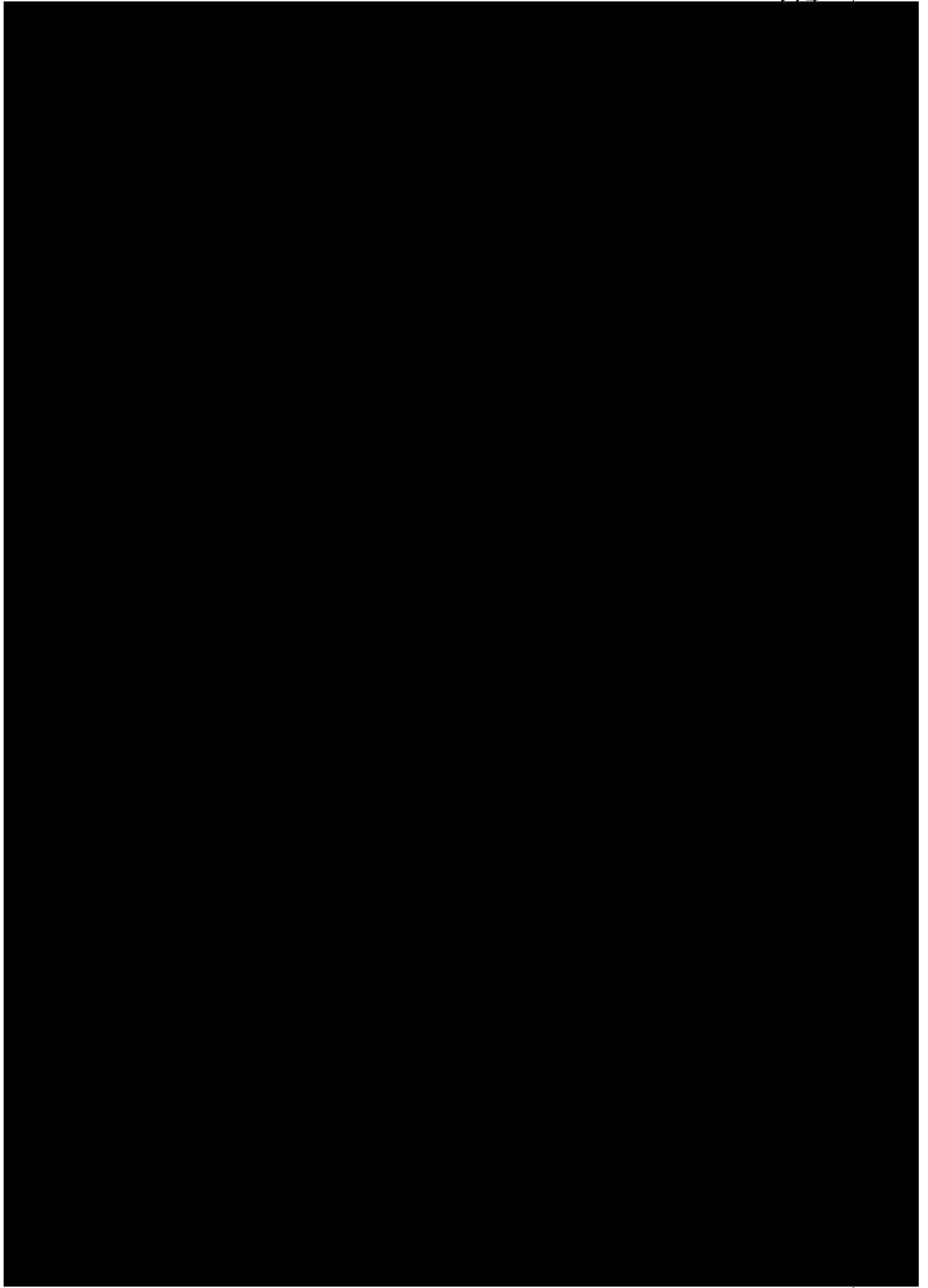
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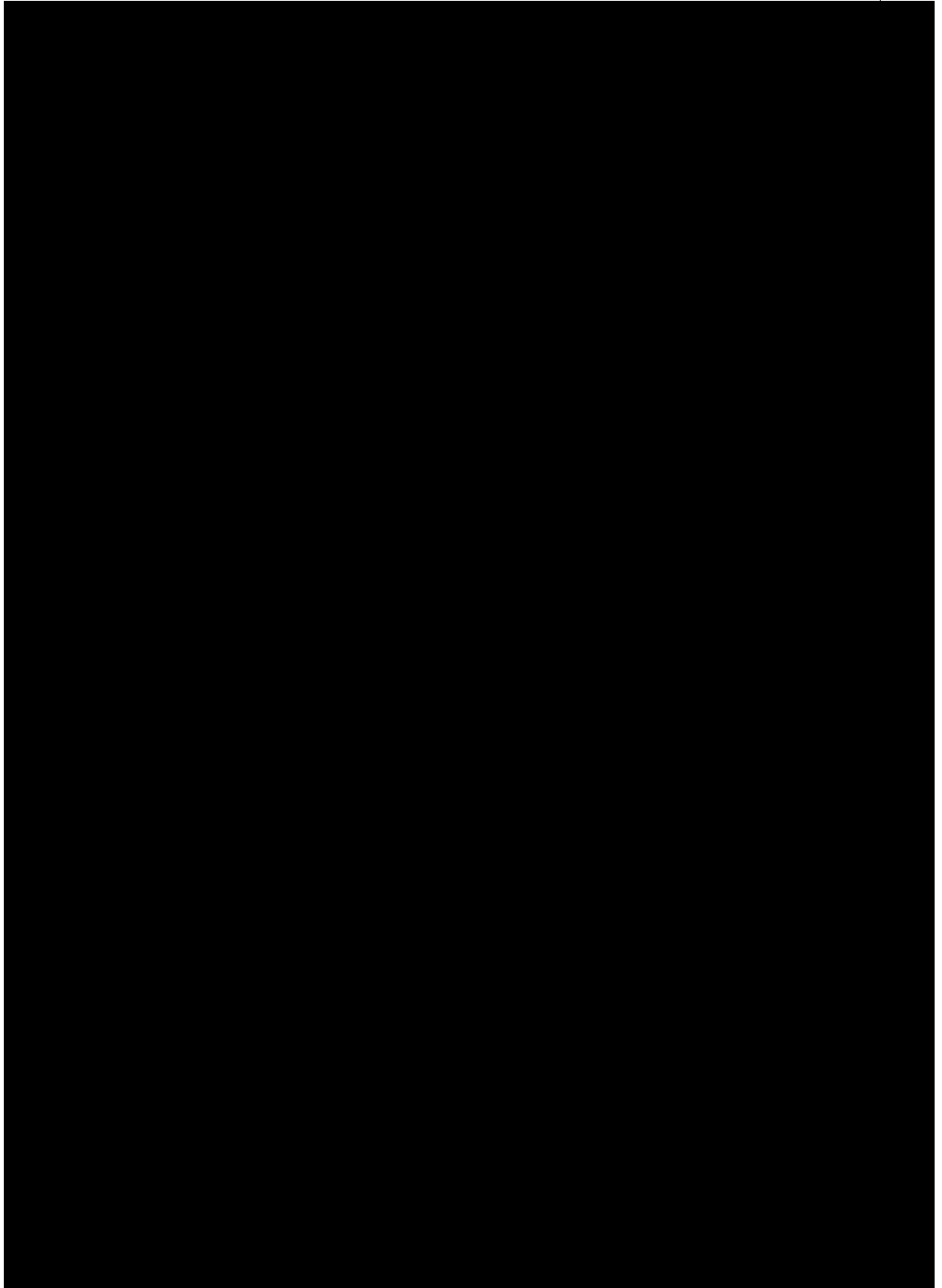
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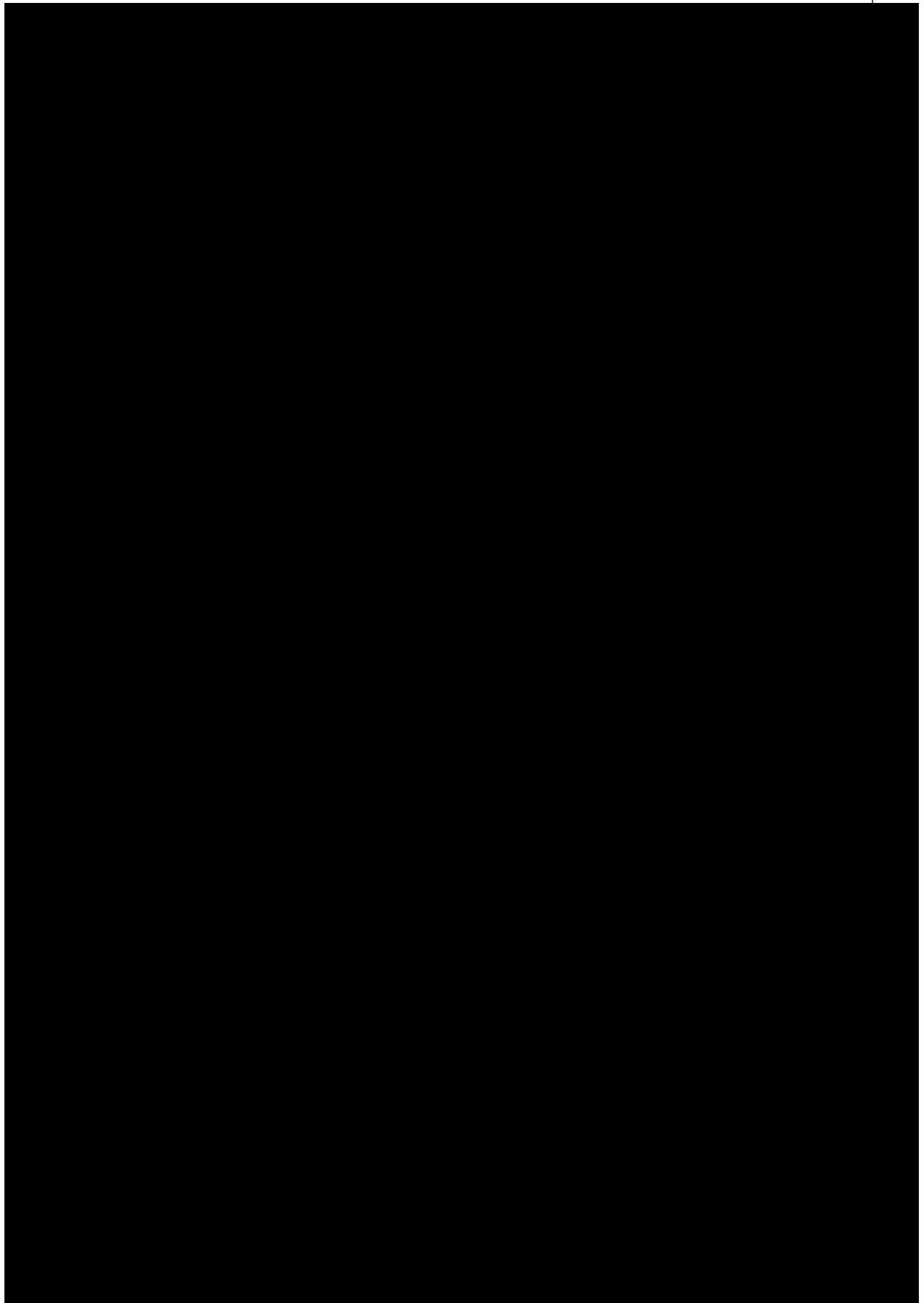
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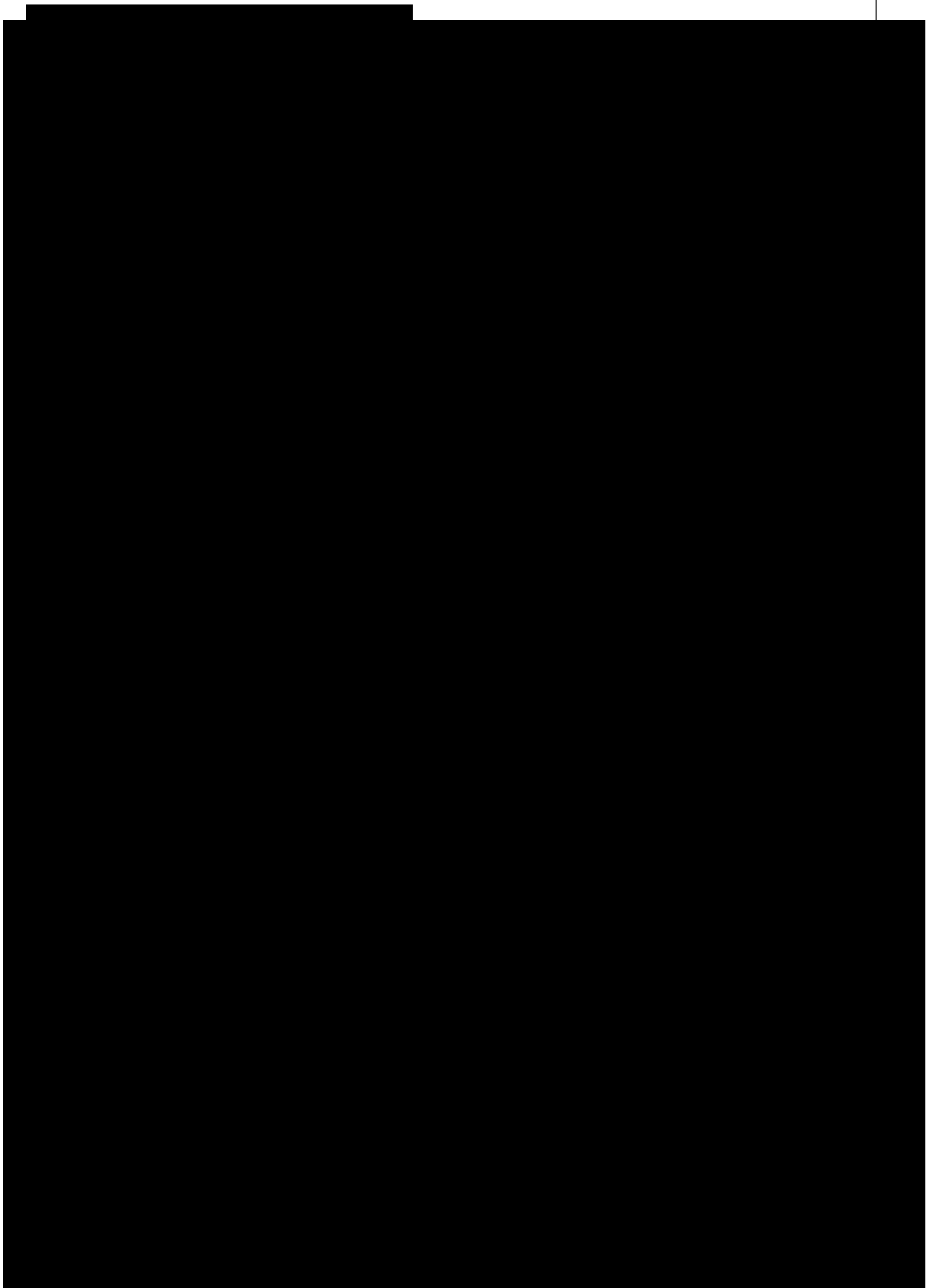


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1 I, S. Arielle Santos, Certified
2 Shorthand Reporter, Certified LiveNote
3 Reporter do hereby certify:
4 That prior to being examined, the witness
5 named in the forgoing deposition, was by
6 me duly sworn to testify the truth, the
7 whole truth, and nothing but the truth.
8 That said deposition was taken before me
9 at the time and place set forth and was
10 taken down by me in shorthand and
11 thereafter reduced to computerized
12 transcription under my direction and
13 supervision, and I hereby certify the
14 foregoing deposition is a full, true and
15 correct transcript of my shorthand notes
16 so taken.
17 I further certify that I am neither
18 counsel for nor related to any party to
19 said action nor in anywise interested in
20 the outcome thereof.

21 

22 _____
23 S. Arielle Santos, CCR, CLR
24

Signature and Errata Sheet
November 2, 2022 Deposition of Alan Cox
*Thomson Reuters Enterprise Centre GMBH and West Publishing Corporation v. ROSS
Intelligence Inc.*

I, Alan Cox, have reviewed the attached transcript of my November 2, 2022 deposition testimony and certify, pursuant 28 U.S.C. § 1746 that the attached transcript is my true and correct testimony during that deposition, subject to the corrections shown below.

Page/Line	Now Reads	Correction	Reason
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Executed on December 12, 2022, at Lafayette, CA.

A handwritten signature in dark ink, appearing to read "Alan Cox". The signature is written in a cursive, flowing style with a large initial "A" and a distinct "C" at the end.

Alan Cox